IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

FJONA DAJLANI and ALLISON EGAN, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BABY GENERATION, INC.,

Defendant.

-,

Ian James Dankelman Smith Gambrell & Russell LLP 201 N. Franklin Street, Suite 3550

Civil Action No.: 1:23-cv-3394-LDH-JRC

NOTICE OF MOTION TO ADMIT ATTORNEY MATTHEW B. GEORGE

Tampa, FL 33602

PRO HAC VICE

TO: Jeremy Richardson Smith, Gambrell & Russell, LLP 1301 Avenue of the Americas, Fl 21 New York, NY 10019

Counsel for Defendant Baby Generation, Inc.

PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the Certificate of Good Standing annexed thereto, I, Matthew B. George, will move this Court pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an order allowing the admission of movant, who is of counsel with the firm of Kaplan Fox & Kilsheimer LLP, and a member in good standing of the bar of the State of California, as attorney *pro hac vice* to argue or try this case in whole or in part as counsel for Plaintiffs Fjona Dajlani and Allison Egan, and the Proposed Class. There are no pending disciplinary proceedings against me in any state or federal court.

Dated: July 6, 2023 Respectfully submitted,

KAPLAN FOX & KILSHEIMER LLP

By: <u>/s/ Matthew B. George</u>
Matthew B. George

Laurence D. King Matthew B. George (*pro hac vice* pending) Blair E. Reed (*pro hac vice* pending) 1999 Harrison Street, Suite 1560 Oakland, CA 94612

Telephone: 415/772-4700 Facsimile: 415-772-4707 lking@kaplanfox.com mgeorge@kaplanfox.com breed@kaplanfox.com

KAPLAN FOX & KILSHEIMER LLP

Joel B. Strauss 800 Third Avenue, 38th Floor New York, NY 10022 Telephone: 212-687-1980

Facsimile: 212-687-7714 jstrauss@kaplanfox.com

WITES & ROGERS

Marc A. Wites (*pro hac vice* forthcoming) 4400 North Federal Highway Lighthouse Point, FL 33064 Telephone: (954) 933-4400 Facsimile: (954) 354-0205

mwites@witeslaw.com

Attorneys for Plaintiffs